

EXHIBIT G

FILED

JAN 28 2020

REONA J. DALY
U.S. MAGISTRATE JUDGE
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

Zachary M. Stauffer,)

Defendant.)

CASE NUMBER 20-MJ-4005-RJD

CRIMINAL COMPLAINT

I, Adam J. Buiter, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Count 1
(Access with Intent to View Child Pornography)

From on or about November 26, 2016, until on or about January 6, 2020, in Marion County, Illinois, within the Southern District of Illinois and elsewhere,

ZACHARY M. STAUFFER,

Subject herein, did knowingly access with intent to view at least one matter which contained any visual depiction that was produced using materials which had been mailed or shipped and transported in and affecting interstate and foreign commerce, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction of such conduct as defined in Title 18, United States Code, Section 2252(a)(4)(B) and 2.

I further state that this complaint is based on the following facts:

INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since 2019. I am currently assigned to the Springfield, Illinois Division of the FBI where I am assigned to work drug trafficking/criminal enterprise investigations and other criminal investigations as they arise. Prior to joining the FBI, I served as a police officer and detective for approximately seven years for the Sioux Falls, South Dakota Police Department. I have a Bachelor's degree in Business with a Biotechnology Emphasis, and a minor in Criminal Justice. I have received law enforcement training from the FBI Academy at Quantico, Virginia, the Drug Enforcement Administration, the South Dakota Division of Criminal Investigation, and other agencies. Since becoming a Special Agent, I have worked with experienced Special Agents who also investigate Child Exploitation offenses. In the performance of my duties, I have investigated and assisted in the investigation of matters involving the possession, collection, production, receipt, and/or transportation of images of child pornography and the solicitation and extortion of children to produce sexually explicit images of themselves. I have also investigated and assisted in the investigation of matters involving individuals using facilities of interstate commerce to knowingly persuade, induce, and entice minors to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense.

2. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States, and to execute search warrants and arrest warrants issued by federal and state courts.

3. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being

submitted for the limited purpose of securing an arrest warrant, and I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **ZACHARY M. STAUFFER** committed violations of Title 18, United States Code, Section 2252(a)(4)(B) and (2).

STATUTORY AND LEGAL AUTHORITY

4. This investigation concerns violations of Title 18, United States Code, Section 2252(a)(4)(B) and (2), relating to the Accessing Child Pornography with Intent to View. Based upon my training and experience, as well as conversations with other experienced law enforcement officers and experienced federal prosecutors, I know the following:

- a. The internet is a facility of interstate commerce.
- b. 18 U.S.C. 2256 (2)(B) defines sexually explicit conduct to include the graphic or simulated lascivious exhibition of the genitals or pubic area of any person.

BACKGROUND OF INVESTIGATION AND FACTS ESTABLISHING PROBABLE CAUSE

5. In August of 2019, the Federal Bureau of Investigation (“FBI”) received information from a foreign law enforcement agency (herein referred to as “FLA”) that has a history of providing reliable information to the FBI regarding child pornography investigations. That FLA had information about a website called [REDACTED], which was located within the “dark web” and only accessible via the TOR network. The TOR network is a computer network available to internet users designed specifically to facilitate anonymous communication over the internet. The TOR network attempts to do this by routing user communications through a globally distributed network of intermediary computers, or proxies, along a randomly assigned path known as a “circuit.” To access the TOR network, a user must install TOR software either

by downloading an add-on to the user's web browser or by downloading the free "TOR browser bundle." The TOR network makes it possible for users to operate websites called "hidden services," in a manner that attempts to conceal the true IP address of the computer hosting the website. Hidden service websites are only available to users operating within the TOR network. Like other websites, hidden service sites are hosted on computer servers that communicate through IP addresses. However, hidden services have unique technical features that attempt to conceal the computer server's location and the identity of the individual(s) responsible for the website's content.

6. [REDACTED] was an online bulletin board dedicated to the advertisement and distribution of child pornography that operated from approximately 2016 to June 2019. On the site's announcements page was the following text; "this website was created to host videos, photos, and discussions of 18 (twinks) and younger of Hurtcore materials (videos & pictures) as well as discussion of such. Sections and forums for posting to the website included "HURTCORE Toddlers Videos (Ages 0-5)," "Preteen/Hebe Children Videos (Ages 6-13)," "Teens Videos (Ages 14+)," "Toddlers Images (Ages 0-5)," "Preteen/Hebe Children Images (Ages 6-13)," and "Teens Images (Ages 14+)." Another forum was named "GORE/DEATH" which included sub-forms for "Toddlers (Ages 0-5)," "Preteen/Hebe Children (Ages 6-13)" and "Teens (Ages 14+)."

7. In August 2019, the FBI received information from the FLA that the Internet Protocol ("IP") address 75.129.243.208, which was the actual IP address and not a disguised proxy address, accessed [REDACTED] on April 29, 2019 at 12:58:02 UTC. On September 10, 2019, the FBI issued an administrative subpoena to Charter Communications for information related to IP address 75.129.243.208. On April 29, 2019, Charter Communications, in response to the

subpoena, affirmed that the IP address 75.129.243.208 was assigned to Zachary Stauffer during the relevant time periods. Charter Communications also provided the address and other identifying information that was associated with Mr. Stauffer, including his address in Salem, Illinois.

8. In January 2020, SA Buiter learned that Zachary Stauffer, had previously been arrested and convicted in 2009 for Aggravated Criminal Sexual Abuse/Victim less than 13. Zachary Stauffer was required to register as a sex offender upon his release from prison for this offense.

9. On January 7, 2020, SA Buiter received a copy of Zachary Stauffer's most recent sex offender registration from the Salem, Illinois Police Department. This registration was completed on April 28, 2019. Zachary registered his address in Salem, Illinois and that address was the same as the one provided by Charter Communications.

10. On January 7, 2020, SA Buiter and FBI SSRA Raymond Hart went to Stauffer's residence in Salem, Illinois during the afternoon hours. Zachary Stauffer answered the door when agents knocked on the door. SA Buiter and SSA Hart identified themselves as FBI Agents, and Stauffer let them into his house. Stauffer said he had lived at his residence in Salem, Illinois for less than one year. Stauffer said his internet provider was Charter Communications. Stauffer said he lived at this address by himself, and other people did not regularly stay with him or use his computers. Stauffer said he had a desktop computer in his office at his residence, and a cellular phone that could access the internet.

11. Zachary Stauffer told SA Buiter that he stumbled into child pornography when he was a teenager. Stauffer admitted to downloading TOR on his desktop computer in his house in Salem, Illinois, and accessing websites to view pictures and videos of child pornography. Stauffer defined child pornography as the sexual, physical, and emotional exploitation of

minors. Stauffer agreed that this included images and videos of individuals under the age of eighteen naked or engaged in sexual acts. Stauffer said he viewed child pornography for more than the past year. Stauffer said the last time he viewed child pornography was last night (January 6th, 2020). Stauffer said he would download the TOR router on his computer, and then access websites such as [REDACTED] to view child pornography. Stauffer said he would delete TOR off of his desktop computer in his house, and run a “file shredder” to delete any images or videos of child pornography after he would view these images and videos on his computer, to hide the trail of what he had viewed. Stauffer described [REDACTED] as a website with nastier child pornography. Stauffer specified that a child cannot consent to sex either way, and the focus of [REDACTED] was videos and images of non-consensual rape. Stauffer said one would need an account to access [REDACTED]. Stauffer said his account was “kittycow” with a password of “thundercat.” Stauffer admitted to using [REDACTED] to access/view child pornography to masturbate, and then he would delete the child pornography. Stauffer said he visited [REDACTED] multiple times a week, from at least one year ago until [REDACTED] was shut down. Stauffer said he preferred to view child pornography of four to twelve year old females. Stauffer specified that the four to twelve year old girls he viewed on [REDACTED] were naked, with their genitals exposed, engaged in sex acts, to include adult males penetrating their vaginas. Stauffer said one his favorite girls to watch child pornography of was “April”, who Stauffer thought was nine years old. Stauffer agreed that the images or videos of April included oral penetration by adult male penises. Stauffer said he used [REDACTED], and other websites, to chat with others about child pornography.

12. Stauffer consented to Agents searching the hard drives from his computer, his cellular phone, an external hard drive, and a USB drive that Stauffer used. SSRA Hart conducted a

preview search of Stauffer's hard drives and digital extraction of Stauffer's cellular phone, and did not find any immediately apparent images of child pornography, consistent with Stauffer's statement that he ran a file shredder to delete his trail of viewing child pornography.

13. On January 10, 2020, the FBI Child Exploitation Operations Unit provided information about the online activity of the username "kittycow" and "kittycow2", related to accounts with those usernames that accessed [REDACTED] during the time frame of November 26, 2016 to July 12, 2018. A sampling of some of the messages posted by the user "kittycow2", recovered by the FBI Child Exploitation Operations Unit from [REDACTED], are listed below:

Date/Time of Post: Nov 26, 2016 22:16

User: kittycow2

Site: [REDACTED]

Thread: A trailer from last Christmas

Message: Last christmas there was a trailer of a girl and a man she was shaking in fear during the whole trailer. There was text that said merry christmas or something like that. Does someone have it? Or any videos/pics?

Date/Time of Post: Dec 27, 2016 02:24

User: kittycow2

Site: [REDACTED]

Thread: Hurt 2

Message: Hope to see more didn't really need the additional Adult video though.

Date/Time of Post: May 7, 2018 06:08

User: kittycow2

Site: [REDACTED]

Thread: GirdLittle(NEW2018-2017) "Slapping"

Message: Original Posters account appears to be gone. Anybody have this?

Date/Time of Post: Jul 12, 2018 23:55

User: kittycow2

Site: [REDACTED]

Thread: Lilian – The Merry Christmas Trailer_mpeg4

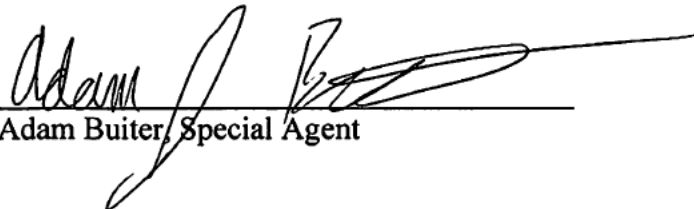
Message: This is one of my favorite trailers you can find it and more here viewtopic.php?f=54&t=6196&p=40027&hilit=lilian#p40027

14. On January 27, 2020, FBI SA Buiter and FBI SSRA Hart conducted a follow up interview with Zachary Stauffer at his residence in, Salem, Illinois. Stauffer clarified that he created the account on [REDACTED] for "kittycow2", and accessed [REDACTED] with that username, since

he forgot the password for the username “kittycow”. Stauffer agreed that he would have accessed [REDACTED] through the “darkweb”, via computer and cellular telephone as “kittycow2” from the time range of November 26, 2016 to July 12, 2018. Stauffer lived in the Salem, Illinois area during that entire date range, which is within the Southern District of Illinois. SA Buiter asked Stauffer if he remembered what the “Lilian- The Merry Christmas Trailer” was about from July 12, 2018. Stauffer said he could not remember all of the details about this trailer that he viewed, but he thought it was a video of a preteen-aged girl engaged in oral sex with an adult male, and/or having her genitalia rubbed by an adult male. Stauffer clarified that the last time he viewed child pornography was on the day before SA Buiter and SSRA Hart talked to him on January 7, 2020. Stauffer accessed that child pornography via the TOR router on his desktop computer inside his residence in, Salem, Illinois.

CONCLUSION

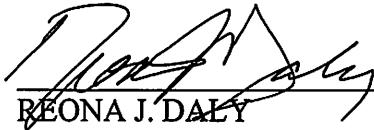
15. Based on the foregoing, I submit that there is probable cause to believe that from November 26, 2016, until on or about January 6, 2020, in Marion County, Illinois, within the Southern District of Illinois and elsewhere, **ZACHARY M. STAUFFER**, did knowingly access with intent to view at least one matter which contained any visual depiction that was produced using materials which had been mailed or shipped and transported in and affecting interstate and foreign commerce, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction of such conduct as defined in Title 18, United States Code, Section 2252(a)(4)(B) and 2.


Adam Buiter, Special Agent

Federal Bureau of Investigation

Subscribed and sworn to before me this

28th day of January, 2020, at Benton, Illinois.



REONA J. DALY
United States Magistrate Judge